

UNITES STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LAURIE BLESSEN

Plaintiff

v.

MARY ELIZABETH INN, and DOES 1-50,

Defendants

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CASE NO. 4:17-cv-05389 KAW

COMPLAINT FILED: 9/19/17

TRIAL DATE: Not Set

**ADMINISTRATIVE MOTION AND
[PROPOSED] ORDER TO RESCHEDULE
CASE MANAGEMENT CONFERENCE
AS MODIFIED**

DATE: January 9, 2018

TIME: 1:30 p.m.

COURT.: 1301 Clay Street, Oakland, CA

Defendant and Cross-Complainant Mary Elizabeth Inn (“MEI”) respectively requests that the Court move the Case Management Conference to February 6, 2018 for the following reasons:

1. MEI is in the process of substituting in new counsel to replace current counsel. MEI’s new attorneys are Peggy Chang, Esq. and Margaret J. Allen, Esq., Beckman Feller & Chang PC, 2298 Durant Avenue, Berkeley, California, 94704.
2. Unfortunately, MEI’s chief executive officer, PMK and client contact Dion Roberts has been unavailable due to an unexpected family emergency. The nature of this emergency was not known to defense counsel until this past weekend.
3. As a result, MEI’S attorneys have been unable to complete transfer of representation from the Law Office of Michael Heath to Beckman, Feller & Chang.
4. Further, neither Mr. Olsen at the Law Office of Michael Heath, nor new counsel at Beckman Feller, have been able to meet with MEI regarding initial disclosures, the discovery plan or much of anything else related to this lawsuit with the exception of discussing the ADR process and preparing the ADR filings.
5. By signing the stipulation below, Plaintiff’s counsel has agreed to a 28-day continuance of the Case Management Conference.

1 6. Therefore, MEI respectfully requests that the Court continue the Case Management
2 Conference now set for January 9, 2018 for 28 days to allow the parties to complete the
3 substitution of counsel process and for Beckman, Feller & Chang to have an adequate
4 opportunity to meet with its client and otherwise undertake the representation

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6 SO STIPULATED:

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8 Dated: January 2, 2018

LAW OFFICES OF MICHAEL HEATH

9
10 /s/ Howard Olsen

11 Howard Olsen
12 Attorney for Defendant and Cross-
13 Complainant,
14 MARY ELIZABETH INN

15 Dated: January 2, 2018

LEGAL ASSISTANCE TO THE ELDERLY

16
17 /s/ Annie Y. Pan

18 Annie Y. Pan
19 Attorney for Plaintiff
20 LAURIE BLESSEN

21 ORDER

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23 Good cause appearing, the motion is GRANTED. The Case Management Conference is
24 rescheduled to February 6, 2018 at 1:30 p.m.

25 IT IS SO ORDERED.

26 Dated: 1/4/18

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28 United States District Magistrate Judge